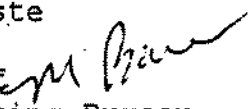


November 20, 1996

MEMORANDUM

TO: Orville D. Green, Assistant Administrator
Air & Hazardous Waste

FROM: Martin Bauer, Chief 
Air Quality Permitting Bureau

SUBJECT: IBP, Kuna
Tier II Operating Permit Amendment Request

PROJECT DESCRIPTION

IBP, Incorporated, operates a beef and rendering facility located in Kuna, Idaho. The facility operates under Tier II Operating Permit (OP) (#001-00030) which was issued on February 26, 1996. IBP has submitted a request to change the packed scrubber tower liquid flow rate requirements based on new source test data.

DISCUSSION

On August 30, 1996, DEQ received an application to amend portions of the Tier II Operating Permit.

FEES

IBP is not a major facility as defined in IDAPA 16.01.01.008.14, therefore, this facility is not subject to registration and registration fees in accordance with IDAPA 16.01.01.525.

RECOMMENDATION

Based on review of application materials, and state and federal rules and regulations, the Bureau staff recommends that IBP, Inc., be issued the amended pages of Operating Permit #001-00030. No public comment period is recommended, no entity has requested a comment period, and the project does not involve PSD PTC requirements.

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cc: R. Wilkosz/TSB
P. Rayne/AFS
J. Palmer, Boise Regional Office
Source File
COF

November 20, 1996

MEMORANDUM

TO: Martin Bauer, Chief
Air Quality Permitting Bureau
Air & Hazardous Waste

FROM: Mike Simon, Air Quality Engineer
Air Quality Permitting Bureau

THROUGH: Susan J. Richards, Permits Manager
Air Quality Permitting Bureau

SUBJECT: Tier II Operating Permit Amended Technical Analysis - IBP, Inc., Kuna

PURPOSE

The purpose of this memorandum is to satisfy the requirements of IDAPA 16.01.01.400 (Rules for the Control of Air Pollution in Idaho) for issuing Tier II Operating Permits.

PROJECT DESCRIPTION

IBP, Incorporated, operates a beef packing and rendering facility located in Kuna, Idaho. The facility is permitted by Tier II Operating Permit (OP) (#001-00030) issued on February 26, 1996. IBP has submitted a request to change the packed scrubber tower liquid flow rate requirements based on new source (stack) test data.

SUMMARY OF EVENTS

On August 30, 1996, DEQ received an application to amend portions of the Tier II OP.

DISCUSSION

IBP, Inc., currently utilizes a Venturi and a Packed Bed Scrubber for emission and odor control at the Kuna facility. Recently, IBP conducted a performance test and discovered that the Packed Bed Scrubber is operating at a lower air and water flow rates than what was previously submitted in the original Tier II OP application.

Section 3.2.3 on pages 9 and 11 of OP #001-00030 limits the liquid flowrate to the Packed Bed Scrubber to a minimum of 700 gallons per minute (gpm). Source test information for the scrubber is listed at a liquid flowrate of 610 gpm and an air flowrate of 43,000 cubic feet per minute (cfm). The liquid to gas ration (L/G) for this scrubber at those operating ranges is still within EPA recommended ranges, however, the permit does not afford operational flexibility in the flowrate requirements. Further review of the OP discovered the Venturi Scrubber requirements, located in Section 3.1.3 on pages 8 and 10, also do not afford maximum operational flexibility. The minimum liquid flowrate requirement is listed as 300 gallons per minute.

It is recommended that the OP requirements be changed to allow for liquid flowrates to be maintained within the manufacturer's recommended ranges. If manufacturer specifications are unavailable, the permittee is allowed to write a scrubber Operation and Maintenance Manual which details the specific liquid flowrates, L/G ratios, etc., in which the scrubber will efficiently operate. These flowrates should be determined based on existing scrubber design practices. Documentation will be made available upon request by DEQ representatives.

FEES

This facility is not a major facility as defined in IDAPA 16.01.01.008.14. Therefore, registration and registration fees in accordance with IDAPA 16.01.01.526 are not applicable.

RECOMMENDATIONS

Based on review of application materials, and state and federal rules and regulations, staff recommend that IBP be issued the amended pages of OP #001-00030 for the beef packing and rendering facility located in Kuna, Idaho. No public comment period is recommended, no entity has requested a comment period, and the project does not involve PSD Permit to Construct requirements.

MB\JRM\MS:jry...ibp\ibp-a.TAM

cc: R. Wilkosz/TSB
J. Palmer, Boise Reg. Off.

P. Rayne/AFS
Source File

T. Trumbull/CAB
COF